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IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF OKLAHOMA

FILED

Richard Glossip, et.al.

APR 14 2021

PLAINTIFFS

CARMELITA REEDER SHINN, CLERK
U.S. DIST. COURT WESTERN DIST. OKLA.
BY DRS, DEPUTY

vs.

CASE NO. CV-14-665-F

Randy Chandler, et.al.,

DEFENDANTS.

WADE LAY, PLAINTIFF - MONADOT

PLAINTIFF (WADE LAY) ADDENDUM TO PROTECTIVE
ORDER - INJUNCTIVE RELIEF FILED 04/07/21
REQUEST FOR DISCOVERY

COME NOW WADE LAY TO PROVIDE THE DETAILS TO THE

CLAIM MADE IN DOC. NO. 390 AND 398, PLAINTIFFS

MOTIONS FOR DISCOVERY AND PROTECTIVE ORDER.

WADE CARELY LAY #516263

OKLAHOMA STATE PENITENTIARY


P.O. BOX 97

MCLESTER, OKLA. 74502

DATE: 04/12/2021

PAGE SE

IN DOC. 1005 500 AND 300 PLAINTIFF PREDICTS THAT
OSP (OKLA. STATE PENITENTIARY) WILL BUILD UPON THE
CURRENT CONDITION OF HIS DAUGHTER (APRIL LAY'S)
PHONE STATUS, FURTHER CLAIMING A TECHNICAL
ANOMALY TO SEPARATE MADE LAY FROM THE ATTOR-
NESSES THAT SUPPORT HIS CAUSE, I.E., HIS FAMILY AND ATTOR-
NEYS. O.S.P. HAS ATTEMPTED TO DO JUST THAT ON
04/07/2021. ON PG. 5 LAY STATES:

"O.S.P. WILL NOT RECTIFY THE PROBLEM WITH
'SECURUS' THE PHONE PROVIDER, WITH LAY'S COM-
MUNICATIONS WITH HIS DAUGHTER. THIS SO-CALL-
ED TECHNICAL PROBLEM IS IDENTICAL TO THE CLA-
IM MADE BY UNIT MGR. PERRY IN 2017, TO CUT
THE PLAINTIFF OFF FROM HIS ATTORNEYS AND FA-
MILY, LEADING TO *Lay v. C.A.T.*, CW-18-CA-RHN-SBS;
AND *Lay v. O.P.O.C.*, CW-17-1224-J, FILED IN THIS COURT.
... IT IS PLAUSIBLE TO SUSPECT A REPEAT OF THE PAST
IN MOTION, THE DISCONNECTION BEING A PRECE-
DENT TO THE SO-CALLED TECHNICAL ANOMALY THAT
WILL OCCUR WITH HIS SISTER (RHONDA KEMP 316-TBT-

PG. 3

"7256); and (KUM LAY 403-327-6123), in the proceedings preceding Lay's execution."

JUDGE FRUIT AND THIS COURT CAN NOW SEE,
THAT O.S.P. HAS DONE PRECISELY WHAT LAY ANTICIPATES.

THIS IS WITH THE PLAINTIFF ASK FOR THE ACCESS TO
VIDEO SURVEILLANCE, WHICH WILL SHOW THE UNBELIEVABLE
ACTIONS OF SECURITY OFFICERS (HOOD AND MONKS),
AND THE OBVIOUS INVOLVEMENT OF ADMINISTRATIVE
STAFF IN THE CONSPIRACY. IN SUMMARY, O.S.P.
CONTRIVES A STORY, THAT, THE SECURUS PHONE

SERVICE IS TEMPORARILY DISRUPTED. YET, IN AN EXACT
DUPLICATE MANNER AS WHAT OCCURRED — BETWEEN
JULY 27 - AUG. 09, 2019, THE TECHNICAL DIFFICULTIES
ONLY APPLY TO WADE LAY, ALL OTHER PRISONERS
ARE ASLE TO ENJOY REGULAR PHONE SERVICE.

F.D.A

*
*) SEE DOC. nos. 46-70, *Lay v. O.D.O.C., Civ-17-1224-J.*

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IT IS IN ESSENCE AN ARBITRARY PHONE

RESTRICTION. THIS IS WHY O.S.P. DESIRES TO

MAINTAIN THE ARBITRARY ENVIRONMENT, WHERE

PRISONERS ARE ALLOWED TO CONTROL THE PHONE,

IT SUITS THEIR AGENDA TO ISOLATE A PRISONER

THEY CHOOSE TO TARGET, USING THE ABDUCTION

AS A MEANS OF DEPRIVATION.

THIS IS WHY O.S.P. ALLOWS THE PASSING OF
COUNTERBAND/CAUNTEEN, AND ALLOWS STAFF

TO PASS CAUNTEEN FOR PRISONERS, AND FOR

STAFF TO ACCEPT CAUNTEEN FOOD PRODUCTS

AS GIFTS, THE VIGILANTE PRISONER POPULA-

TION SERVES O.D.O.C.'S CROOKED AGENDA.

THE PLAINTIFF UNDERSTANDS IT IS A HARD

PG. 5

FILL FOR THE COURTS OR SOCIETY TO
SWALLOW, THAT YOU HAVE ALLOWED SUCH
A CRUCIAL DEPARTMENT OF GOVERNMENT
TO BECOME SO DIabolical; THAT IS UNITY
THE EVENTS OF 04/07/2021, ON 14 UNIT
SOUTHWEST QUAD BETWEEN 7:45 A.M. AND
1:47 P.M. ARE SO IMPORTANT, AND RELEVANT TO
THE IMPLEMENTATION OF THE EXECUTION PROTOCOLS.

SIMILAR TO THE VENGEFUL ACTIONS OF DEPUTY
WARDEN RAINKINS IN 2019, AND THE DECEITFUL
AND CROOKED ACTIONS OF DEP. WARDEN COOPER

²
IN 2018, ADDITIONALLY, IT WAS D.W. RAINKINS WHOM
USED HIS POWERS TO WRITTE UP TO 600 BODOS

F.D.R.

1) THE ACTIONS OF D.W. RAINKINS ARE DESCRIBED IN DEC. NOS. 52-TO OF
Lay v. O.D.O.C., Civ-17-1224-5; AND LAY'S OPENING BRIEF TO THE 10TH
CIRCUIT, NO. 20-6038. 2) COOPER'S ACTIONS ARE DESCRIBED IN
DEC. NOS. 45-51 OF THE SAME CASE, AS F.D.# 1.

Pg 6

CHARGES SHORTLY AFTER ROUNDRUN LAY OUT

OF THE CLASSIFICATION HEARING, SIMPLY BECAUSE

AUSE THE PLAINTIFF BROUGHT EVIDENCE

TO THE HEARING TO SHOW THE MALFEASANCE

OF PRISON OFFICIALS, SUCH AS: D.W. COOPER'S

EMBEZZLEMENT OF TRUST FUND DOLLARS

SENT TO THIS COURT ILLEGALLY IN SEPT. OF

2018. (SEE DOC. NO. 66 OF *Kay V. O.D.O.C.*, CIV-17-

1224-J)), O.S.P. RETURNS TO THAT SAME TACTIC 04/07/21.

THIS ABUSE OF POWER HAS BECOME THE NORM.

AN ACCEPTABLE MODE OF OPERATIONS BLESSED

BY THE O.D.O.C. IT VIOLATES THE OKLA.

ADMINISTRATIVE PROCEDURE ACT, WHICH IS, BY STATE

LAW, A GOVERNING PRINCIPLE RELEVANT TO THE

F.D.

+ OCT. 01, 2018 HEARING TO DETERMINE WHERE DEATH ROW
PRISONERS WOULD BE HOUSED. (ACLU INTERROGATORIES)

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EXECUTION PROTOCOLS AND CONTROLLED !

DETAILS SURROUNDING THE EVENTS OF 04/07/2021

AT 7:45 A.M. PLAINTIFF (LAWY) ASK OFFICER HOOD FOR

THE PHONE TO CALL ATTORNEYS. AT 8:30 A.M. LAW REPEATS
3

THE REQUEST. AT 9:00 A.M. HOOD REPORTS THE PHONE

IS NOT WORKING, BLAMES THE SECURUS PHONE PROVIDER.

HOWEVER, IDENTICAL TO THE EVENTS THAT OCCURRED ON

JULY 27, 2019, THE PHONE IS BEING PASSED BY

PRISONERS IN THE SAME PATTERN THAT IT IS SHARED

EACH DAY, IT APPEARS HOOD IS REPEATING THAT SAME PLOYE

THAT TRANSPRIED IN 2019. (SCT. WORKS BEING IN THE CONTROL

ROOM 04/07/21, IS ONE OF THE OFFICERS INVOLVED IN THE

F.O.A

3) DUE TO LAWY'S COMPLAINTS TO THE O.D.O.C. DIR. SCOTT CRAN, THE H-UNIT
MGR. MR. KIRBY IMPLEMENTS A RUSE. THE SCHEME IS TO HAVE O.S.P.
SECURITY OFFICERS GIVE THE PLAINTIFF PHONE ACCESS EARLY IN
THE MORNING, THEN ALLOW PRISONERS TO CONTROL AND PASS
THE PHONE, AN ARTIFICE THAT VIOLATES POLICY AND HAS NOT LASTED.

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EVENTS OCCURRING BETWEEN JULY 27, 2019 AND
AUG. 09, 2019).

AT 9:30 AND 10:00 A.M. LAY CONFRONTS OFF. HOOD
ABOUT THE INCONSISTENCY OF PRISONERS PASSING
THE PHONE VIA. CANDALAC (VIOLATING THE ORDER OF
O.D.O.C. DIRECTOR SCOTT CROWN) AND, WHY PRISONERS
WOULD BE SEEKING THE PHONE HOLDING IT FOR
30 TO 60 MINUTES, THEN PASSING IT TO ANOTHER
PRISONER IF THE SERVICE IS OUT, THAT, THE

SAME EVENTS OCCURRED IN JULY OF 2019. AT 10:20
A.M. OFF. HOOD GIVES THE PHONE TO THE PLAINTIFF
STATING: "HERE, SEE FOR YOURSELF IT DOESN'T
WORK."

IN CHECKING THE PHONE SERVICE, THE PLAINTIFF
BETWEEN 10:20 A.M. AND 11:30 A.M. HE

Ac-9

COULD DISCERN THAT THE PHONE LINE HAD BEEN
UNPLUGGED, IDENTICAL TO THE SOUND PRODUCED
IN JULY OF 2009. CONSIDERING THE ACTIONS OF
O.S.P. SECURITY OFFICERS HOOD AND MOOKS, THE
ACTIONS OF OTHER PRISONERS, LAY CONCLUDES
THAT, DUE TO O.S.P. KNOWING LAY WOULD ATTEND
THE TRIAL (SEE DOC. NO. 402), BECAUSE, O.S.P.
STAFFS OPEN ENVELOPES AND COPIES THE DOCUMENTS,
THEY IMMEDIATELY ACT TO BEGIN AN EFFORT
TO CUT THE PLAINTIFF OFF FROM HIS COMMUNICATIONS
WITH FAMILY AND ATTORNEYS, LAY ANTICIPATES THE WORST.
THE O.S.P. STAFF ASSIGNED TO THIS TASK
HOWEVER, C.E. SGT. MOOKS AND OFFICER HOOD,
ARE NOT THE SHARPEST TOOLS IN THE SHED.

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WHAT TRANSPRISES IN JULY AND AUGUST OF 2019, UNDER

Sgt. CARROT, THAT GROUP OF OFFICERS WERE

OF A HIGHER LEVEL OF EXPERTISE, OR EXPERIENCE

OBEYING THE ILLEGIT ORDERS OF THEIR SUPERIORS,

AT 11:30 A.M. LAW DECLARIES TO OFF. HOOD HIS

SUSPICIONS, THE PLAINTIFF TELS THE YOUTHFUL

OFFICER OF THE EVENTS OF 2019, AND MONKS

INVOLVEMENT, AND BOLDLY DEMANDS HE - PLUG

THE PHONE BACK IN ,

AT 11:45 A.M. AFTER OFF. HOOD FINISHES HIS

COUNT, JUST SECONDS AFTER HOOD ENTERS THE

CONTROL ROOM, SGT. MONKS BENDS DOWN TO

THE PHONE BASE AND PLUGS THE PHONE IN.

PLAINTIFF HAS THE PHONE ON, HELD TO HIS

8cm 11

EAR. HE MAKES (3) THREE CALLS DURING THE
FIVE MINUTES THE PHONE IS ON, UNTIL OFF.

HOOD WALKS OVER TO THE PHONE BASE

AND UNPLUGS THE PHONE, ONLY AFTER HOOD

ENGAGES IN A SHORT PHONE CONVERSATION WITH

SOMEONE, PLAINTIFF BELIEVES IT IS WITNESS-

ENTER INSTIGATES THE RUSE, i.e., SOMEONE

IN A POSITION OF AUTHORITY. THE EVENTS

THAT FOULD SUPPORT THIS ASSUMPTION,

IN A NORMAL SETTING, A PRISONER FALSELY ACCUSING

AN OFFICER OF SUCH AN ACT, SECURITY OFFICERS

WOULD DEMAND THE PRISONER TO SURRENDER THE

PHONE AND WRITE THE OFFENDER UP ON CHARGES; BUT

IN THIS INSTANCE MADE LAY IS BEING TRUTHFUL,

PC. 12

which is why O.S.P. SENDS SGT. SHELTON TO THE
S.W. ROAD, SHELTON ATTEMPTS TO SMOOTH THINGS
OUT, HE BEGINS THE COVER STORY: TECHNICAL
DIFFICULTIES HAVE CUT OFF THE PHONES AND SECU-
RIES IS WORKING ON IT.

AT 12:35, AFTER THE CONVERSATION WITH SGT.
SHELTON, SHELTON ENTERS THE CONTROL ROOM,
SECONDS LATER, SGT. MONKS BENDS OVER AND
PLUGS IN THE PHONE. AGAIN, THE PLAINTIFF IS
WATCHING WITH THE PHONE TO HIS EAR.
HOWEVER, THE INCIDENT ESCALATES, SGT. MONKS
AND OFFICER HOOD CONTINUE TO DISRUPT PHONE
SERVICE. IN THE MIDDLE OF A CALL WITH BARBARA
TERNIKOW (FED. PUBLIC DEFENDER - OKC) OFF.

HOOD UNPLUGS THE PHONE. SHORTLY AFTER THIS

AMBER ROBISON ENTERS THE S.W. QUAD OF

H-UNIT, THE PLAINTIFF SHOUTS: "SCOT. MONKS

AND HOOD ARE UNPLUGGING THE PHONE". IMMEDI-

ATELY, THE PHONE IS PLUGGED BACK IN.

THIS OCCURS ONE MORE TIME. IRONICALLY, MR.

KIRBY (H-UNIT M.R.) ENTERS THE UNIT AND HOOD

PLUGS THE PHONE IN AS THE UNIT M.R. APPROA-

CES CLOSE PROXIMITY TO LAY'S CELL. AFTER

DISCUSSING THE MATTER WITH H-UNIT M.R. KIRBY,

IT IS CLEAR, SCOT. MONKS AND OFF. HOOD WERE

DOING WHAT THEY WERE TOLD, O.S.P. IS ATTEM-

PING TO DESTROY WHADE LAY'S ABILITY TO PREPARE

FOR THE TRIAL OF THIS ACTION.

P.C. 14

ANOTHER ELEMENT OF THIS CONTRAVENTION, IS

THE DEPRIVATION OF FUNDAMENTAL RIGHTS, SUCH AS;

SHOWERS AND LEGAL SERVICES. LAY IS DEPRIVED

OF SHOWER ON 04/05/2021 BY OFFICERS HOOD AND

POLCHAKY AND SGT. MCKEEKS. ON 04/08/21 O.S.P.

FAILS TO PROVIDE SHOWERS FOR ANY PRISONER.

(NOTE: LAY WAS AWAKE UNTIL 11:30 P.M. ON THURSDAY

04/08/21, IT IS POSSIBLE O.S.P. WAITS UNTIL THE PLAINTIFF

IS ASLEEP, RUNNING SHOWERS IN THE MIDDLE OF THE

NIGHT, AND THEN CLAIM, PRISONERS WERE GIVEN

OPPORTUNITY TO SHOWER.)

ADDITIONALLY, SINCE LAY HAS SHOWN A WILLINGNESS

TO PARTICIPATE IN THE TRIAL, O.S.P. HAS DEPRIVED

F.D.P.A.

THIS OCCURS OFTEN ON 4-SIDE SW. QUAD OF H-UNIT. O.S.P.
WAITS UNTIL MIDNIGHT OR LATER, AND ONLY SHOWERS TWO
OR THREE PEOPLE; HOWEVER, THIS DOES NOT OCCUR ON THE
OTHER SIDE OF B.W. QUAD. 3-SIDE IS DONE AT A REASONABLE TIME,

P.L. 15

HIM OF LEGAL SERVICES, AND WILL NOT PROVIDE
THE PLAINTIFF WITH CLEMENCE FORMS TO CONTINUE
HIS COMPLAINT TO THE ADMINISTRATIVE REVIEW
AUTHORITY. THIS IS WHY LAY HAD WRITTEN THE O.D.O.C.
DIRECTOR SCOTT CROWN. WHEN THE PRISON OFFICIALS
AT A CORRECTIONAL INSTITUTION IN OKLAHOMA ABUSE
THE CLEMENCE PROCESS, IT IS ALLOWED UNDER
O.D.O.C. POLICY FOR A PRISONER TO WRITE A PRIVE-
LEGED LETTER TO THE DIRECTOR TO ADDRESS THE
ISSUES. (SEE DOC. NO. 398140 OF LAY W/O.D.O.C. CR-13-481-TAW-SPS).
THE COURT HOWEVER CAN SEE, THAT THE O.D.O.C.
REFUSES TO DEAL WITH THE MALFEASANCE, SO THE
LAWLESS ENVIRONMENT PERSIST, AND DOWN TRADE LAY
IS DEPRIVED OF THE NECESSARY SERVICES TO FULFILL

PG. 16

OF DOC NO. 399,
THE COURT'S REQUIREMENTS. (SEE PL. 1¹, FOOTNOTE

NOS. 1 & 2, JUDGE FRUIT'S REFERENCE TO DOC. NOS. 341

AND 381; AND F.N. NO. 3 AFFIDAVIT OR DECLARATION).

O.S.D. IS WITHHOLDING CRUCIAL ACCESS TO FUNDAMENTAL

RIGHTS, TO INCLUDE ATTEMPTING TO CUT LAW

OFF FROM COMMUNICATING WITH ATTORNEYS AND

FAMILY, TO DESTROY HIS ABILITY TO PARTICIPATE IN

THE TRIAL). SIMPLY BEING PRESENT IS NOT

ALL THAT IS REQUIRED.

PLAINTIFF REITERATES THE NEED FOR INJUNCTIVE RELIEF.

WHY DOES THIS COURT NOT UPHOLD THE EQUAL PROTECTION

OF THE LAWS PRINCIPLE IN THIS CASE CONCERNING

WADE LAW. PLAINTIFF DEMANDS THE COURT FOR PROTECTIVE

ORDER, ASKING THIS COURT TO ORDER O.S.D. TO PRECLUDE

TO LAY THE EQUAL RIGHT TO ACCESS THE RIGHTS ALL

PRISONERS ARE SUPPOSED TO ENJOY. TO PURCHASE

PROPERTY, TO LEGAL SERVICE, TO SHOWERS, ETC.

ADDITIONALLY, LAY MOTIONS THE COURT TO ALLOW FOR

DISCOVERY OF VIDEO SURVEILLANCE, IN PARTICULAR,

THE DAY OF 04/07/2021. THE EXTREME PREJUDICE

AND TARGETTING OF INADE LAY IS EASILY REVEALED

IN SO MANY FORMS. THE FACT O.S.P. IS WILLING TO

DEPRIVE MULTIPLE PRISONERS OF FUNDAMENTAL RIGHTS,

SUCH AS SHOWERS, JUST TO HURT ONE INMATE; AND THE

UNIMAGINABLE INMATURITY THAT IS EXHIBITED ON

WEDNESDAY 04/07/21, THAT IT IS AN ACT CONTINUED

BY ADMINISTRATIVE STAFF IS UNCONSCIONABLE.

THIS IS A DEATH PENALTY CASE! THE PLAINTIFF

AG 18

MUST BE PROVIDED PROTECTION FROM THE DEFENDANTS

THE COURT MUST RECOGNIZE THE TRUTH, THAT

PREJUDICE NEVER EXERCISES REASON. PRISON

OFFICIALS ARE MOVED BY THEIR PRIDE AND ARROGANCE,

THIS IS WHAT FOSTERS THE FOOLISH ACTIONS OF WEDNESDAY

01/07/2021, WHEN O.S.P. TRIES TO DUPLICATE THE PHONE

RESTRICTION OF JULY 27, 2019 THROUGH AUGUST 09, 2019.

TO PUT FORTH THE RUSE THAT THE PHONE IS BROKEN, BLAME

IT ON A TECHNICAL ANOMALY, YET BELIEVE THEY CAN

ALLOW EVERY OTHER PRISONER ACCESS TO THE PHONE.

YOU SEE THIS SAME TYPE OF ARROGANCE IN 2014,

WHEN O.D.O.C. DIRECTOR MR. PATTON STATES: " HIS

VEIN BLEW", AS IF THE SIMPLE DECLARATION CONCERNING

THE BOTCHED EXECUTION OF MR. LOCKET WOULD SUFFICE,

PC_19

EVEN THOUGH THE NEGLECT AND ABUSE OF PRISON
OFFICIALS AND THE O.D.O.C. WAS THE CAUSE THAT
PRODUCED AN 8TH AMENDMENT VIOLATION. FOR
THE COURT, THE OTHER PLAINTIFFS, OR THE STATE
OF OKLAHOMA TO RELY ON NEW PROTOCOLS TO REMEDY
THE INHERENT CORRUPTION WITHIN THE O.D.O.C. IS
FOOLISH.

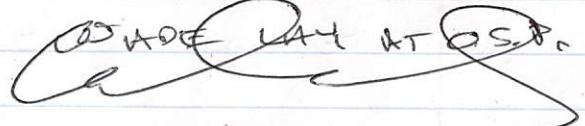
(A.P.A.)

THE ADMINISTRATIVE PROCEDURE ACT REQUIRES A
STRICT COMPLIANCE TO O.D.O.C. POLICY. WHEN IT IS
CLEAR THAT THE O.D.O.C. HAS ABUSED ITS DISCRETION
ALLOTTED TO THEM UNDER THE ACT, i.e., THE A.P.A.,
STATE LAW PROVIDES A MEANS TO REEXAMINE THEIR
AUTHORITY. THAT TIME HAS COME!

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PLAINTIFF KELVIN BEALS THE COURT TO PROVIDE
LAY TO RESPOND TO THE MOTION FOR SUMMARY
JUDGMENT FILED 02/19/21, AND LAY DID NOT
RECEIVE THE MOTION UNTIL THE LAST DAY OF
FEBRUARY FOR FILING, i.e., 02/26/21, AT 1:30 P.M.
LAY FILES FOR DISCOVERY ON 03/15/21, AFTER
ENDURING A COVID-19 ILLNESS FROM 02/23/21
UNTIL 03/11/21. THE MOTION FOR DISCOVERY UNDER
FED. R. CIV. P. 56(d) IS TIMELY.)

RESPECTFULLY SUBMITTED


WADE RAY AT O.S.A.

04/12/2021

P.O. BOX 97

NECHESTER, OKLA. 74602